



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**215 Fremont Street
San Francisco, Ca. 94105**

MEMORANDUM

5-11-87

SUBJECT: Suspected Transporter Violation

FROM: Robert M. Mandel
On-Scene Coordinator, Emergency Response Section (T-3-3)

TO: Karen Schwinn
Chief, RCRA Enforcement Section (T-2-4)

On 4-25-87, we shipped 720 gallons of waste acid from the Rigel St. Drum Site, San Diego to Eticam, Inc., Fernley, NV., a TSD we had contracted with to treat the waste (manifest attached). The transporter, Pacific Vacuum Truck Co. Inc., was hired to deliver the load to Fernley between the hours of 7:00AM and 3:00PM on Monday, 4-27-87. The TSD reported to us that our truck contained 1320 gallons (600 more than we shipped) and contained 600ppm boron, which was not in our waste. Eticam cannot handle boron wastes efficiently, and would not normally accept this type of waste. They are, justifiably, upset. I'm upset also that I have been apparently a victim of someone adding waste to my manifested load and having the government pay for the shipment and treatment of someone else's waste.

One other reason I'm very concerned about this incident is that because of the extreme care we went to in bulking the waste acids aboard the vacuum truck to avoid reactions and acid gas releases, I fully realize the dangerous potential consequences from the addition of any material to the vacuum truck. Adverse reactions include the rapid build-up of high temperatures and pressures which could cause tank failure during shipment, and the potential of an acid gas release.

This was a removal action under Superfund. I have discussed this incident with Sandy Smith, OCI, Allan Biaggi, NV DEP, and Steve Fong, DOHS Hauler Unit for their follow-up.